

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
EASTER DIVISION**

SUSAN HEDGEPEETH

PLAINTIFF

V.

CIVIL ACTION NO. 2:18-cv-161-KS-MTP

**CARMAZZIE, INC., d/b/a CARMAZZI
GLOBAL SOLUTIONS**

DEFENDANT

COMPLAINT

COMES NOW SUSAN HEDGEPEETH, Plaintiff, in the above style and numbered cause, by and through her attorney of record, Thomas L. Tullos, and files this her Complaint against the Defendant, Carmazzie, Inc., d/b/a Carmazzi Global Solutions, and for cause would show unto this honorable Court as follows, to-wit:

1.

That the Plaintiff, Susan Hedgepeth, is an adult resident citizen of the Second Judicial District of Jones, County, Mississippi.

2.

That the Defendant, Carmazzie, Inc., d/b/a Carmazzie Global Solutions, is a California corporation, not qualified to do business within the State of Mississippi, and whose registered agent for service of process is James P. Carmazzie, 1026 Florin Road, No. 384, Sacramento, California, 95831-3513. That said corporation can also be served with process by and through its President, Angela Carmazzie at 1026 Florin Road, No. 384, Sacramento, California, 95831-3513.

3.

That the Plaintiff is a transcriptionist/court reporter who entered into a contract with the Defendant to provide transcription services and other services in regards to hearings held before the Social Security Administration, Office of Hearings and Appeals, within the State of Mississippi.

4.

That the Defendant is allegedly a small, disadvantaged, minority woman owned business that has contracted with the Social Security Administration to provide transcription and other services for the hearings conducted before the Social Security Administration, Office of Hearings and Appeals within the State of Mississippi. That attached hereto as Exhibit "A" is a true and correct copy of an Independent Contract Agreement entered into by and between the Plaintiff and the Defendant. That said contract is made a part hereof as if copied verbatim herein in full in words and in figures.

5.

That pursuant to said contract, the Plaintiff's compensation amount and calculation therefore was to be inserted into a work order signed by the parties. That the Contractor was to submit an invoice for compensation expense reimbursement at times agreed in the work order or work orders. That the Defendant contracted that payment to the independent contractor was to be made according to a standard sixty (60) day payment term. Further, that if the Defendant had any objections to the Plaintiff's services performed, then the Plaintiff's payments would be delayed until any such rejections had been resolved.

6.

That the Plaintiffs has performed pursuant to the contract. That the Plaintiff has handled numerous hearings before the Social Security Administration, Office of Hearings and Appeals, and has, pursuant to the contract, submitted her work orders and requested to be paid for compensation and reimbursement of expenses. However, the Defendant has failed and refused to abide by the contract. That the Defendant has been consistently late in paying the amounts billed unto it by the Plaintiff, presently owes the Plaintiff \$7816.59, and has failed and refused to pay the aforesaid amount, although it is under a contractual obligation to do so.

7.

That the Defendant is in willful and contumacious violation of the contract, and has committed bad faith against the Plaintiff.

WHEREFORE, PREMISES CONSIDERED, Plaintiff, Susan Hedgepeth, demands judgment against the Defendant, Carmazzi, Inc., d/b/a Carmazzie Global Solutions for all damages to which she may be entitled, plus court costs, filing fees, attorney fees, interest, and any and all other relief to which she is entitled.

Respectfully Submitted
SUSAN HEDGEPETH

/s/Thomas L. Tullos
BY: THOMAS L. TULLOS
Attorney at Law

/s/Thomas L. Tullos

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